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January 28, 2019

Dean Carroll, Environmental Engineer II  
Division of Air Quality, NC DEQ  
127 Cardinal Drive Extension  
Wilmington, NC 28405

Re: **Permit No. 10313R01 – Fumigation at Port of Wilmington, NC**  
**Facility ID: 6500356**  
**Application No. 6500356.19A (name change)**

Dear Mr. Carroll:

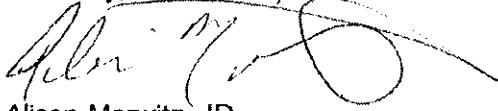
As Anne Bookout has now informed you, I am her successor at Ecolab and furnish this response to your letter dated January 16, 2019, referenced above, on behalf of John Achzet.

Ecolab understands that DEQ has determined to refrain from renewing the referenced permit and from acting on Ecolab's application for a name change until we have submitted a detailed monitoring plan and control measures as requested in the Additional Information Letter, dated July 26, 2018, to John Achzet. In response to the actions laid out in your letter dated January 8, 2019, Ecolab's response is as follows:

1. Permit revision 1031R02 renewal: Ecolab acknowledges that DEQ has not yet issued the permit renewal that Ecolab timely requested for Permit 10313R02.
2. Monitoring Plan: Ecolab has been working diligently to develop a detailed monitoring plan and control measures that are acceptable to DEQ. Given the lack of any established standards to guide our process, Ecolab has engaged with and will continue to work with DEQ staff to create a monitoring plan and control measures that satisfy DEQ while still being technically and economically feasible. In accordance with this, Alison Marwitz, Anne Bookout (Ecolab contractor), and Jeff Marshall (SCS Engineers) met with Michael Abraczinskas and Michael Pjetraj with the DEQ on January 15, 2019, to discuss control measures and begin developing a monitoring plan. Tentative solutions were discussed and each group agreed to further evaluate the proposed solutions. A subsequent meeting is scheduled for February 7, 2019 to discuss the proposed solutions and evaluate next steps.
3. Ownership Change application No. 6500356.19A: As Royal Pest Solutions no longer exists as a business entity, please ensure that DEQ records are updated to reflect the change in our entity information. While our telephone contact information remains the same, all email addresses that formerly used the domain "royalpest.com" have been changed to "ecolab.com."

Please contact me should you have any questions or wish to discuss this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alison Marwitz', with a large, stylized loop at the end.

Alison Marwitz, JD

Copies via email:

John Achzet

Anne Bookout

Staci Johnston

Brad Newland, WiRO Regional Supervisor

Mike Abraczinskas, DAQ Director, Raleigh Central Office